

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
: Case No. 08-13555 (SCC)  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, :  
: Debtors. :  
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**NOTICE OF PRESENTMENT OF  
[PROPOSED] SUPPLEMENTAL CONFIDENTIALITY  
STIPULATION AND PROTECTIVE ORDER BETWEEN  
LEHMAN BROTHERS HOLDINGS INC., THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF LEHMAN BROTHERS HOLDINGS INC.,  
JPMORGAN CHASE BANK, N.A., AND GIFFORD FONG ASSOCIATES**

**PLEASE TAKE NOTICE** that the undersigned request presentment of the annexed [Proposed] Supplemental Confidentiality Stipulation and Protective Order Between Lehman Brothers Holdings Inc., The Official Committee Of Unsecured Creditors of Lehman Brothers Holdings Inc., JPMorgan Chase Bank, N.A., and Gifford Fong Associates (the “Proposed Stipulated Order”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **October 23, 2015 at 10:00 a.m.** (prevailing Eastern time).

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Proposed Order must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User’s Manual for the Electronic Case Filing System may be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered

users of the Bankruptcy Court's case filing system (with a courtesy hard copy delivered directly to Chambers), and any objection must further be served upon: (i) Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, New York, New York 10010, Attn.: Tyler G. Whitmer, Esq., counsel for the Official Committee of Unsecured Creditors appointed in these cases; (ii) Farella Braun + Martel LLP, 235 Montgomery Street, 17th Floor, San Francisco, CA 94104, Attn.: Carly O. Alameda, Esq., counsel for Gifford Fong Associates; (iii) Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, New York, 10178, Attn.: Michael J. Moscato, Esq., counsel for the Debtors and Debtors in Possession; and (iv) Wachtell, Lipton, Rosen & Katz, 51 West 52nd Street, New York, New York 10019, Attn: Ian Boczko, Esq., Counsel for JPMorgan Chase, N.A. so as to be received no later than **October 22, 2015 at 4:00 p.m.** (prevailing Eastern time). Unless objections are timely received in accordance with this paragraph, the Proposed Stipulated Order may be entered without a hearing.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely filed, a hearing will be held at the next omnibus hearing date scheduled in these cases. The moving and objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: October 13, 2015  
New York, New York

**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**

By: /s/Tyler G. Whitmer  
Tyler G. Whitmer  
51 Madison Avenue  
New York, New York 10010  
Counsel for the Official Committee of  
Unsecured Creditors